

SKLAR KIRSH, LLP
Ian S. Landsberg (SBN 137431)
ilandsberg@sklarkirsh.com
William H. Dance (SBN 230041)
wdance@sklarkirsh.com
1880 Century Park East, Suite 300
Los Angeles, California 90067
Telephone: (310) 845-6416
Facsimile: (310) 929-4469

Attorneys for Defendant Grant Thornton, LLP

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA, NORTHERN DIVISION

In re
Channel Technologies Group, LLC,
Debtor.

Corporate Recovery Associates, LLC, as
Trustee for the Liquidating Trust of Channel
Technologies Group, LLC,

Plaintiff,

v.

Grant Thornton, LLP,
Defendant.

Case No. 9:16-bk-11912-DS

Chapter 11

Adv. No. 9:18-ap-01058-DS

The Hon. Deborah J. Saltzman

**DEFENDANT GRANT THORNTON,
LLP'S ANSWER TO THE SECOND
AMENDED COMPLAINT**

Date: September 10, 2019
Time: 1:00 p.m.
Place: Courtroom 1639
United States Bankruptcy Court
1255 E. Temple Street
Los Angeles, CA 90012

Defendant GRANT THORNTON, LLP ("Defendant") answers the Second Amended Complaint of Plaintiff CORPORATE RECOVERY ASSOCIATES, LLC ("Plaintiff"), admitting, denying, and alleging as follows:

ANSWER

1. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 1.

1 2. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
2 allegations contained in Paragraph 2.

3 3. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
4 allegations contained in Paragraph 3.

5 4. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
6 allegations contained in Paragraph 4.

7 5. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
8 allegations contained in Paragraph 5.

9 6. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
10 allegations contained in Paragraph 6.

11 7. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
12 allegations contained in Paragraph 7.

13 8. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
14 allegations contained in Paragraph 8.

15 9. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
16 allegations contained in Paragraph 9.

17 10. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
18 allegations contained in Paragraph 10.

19 11. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
20 allegations contained in Paragraph 11.

21 12. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
22 allegations contained in Paragraph 12.

23 13. Defendant admits the allegations contained in Paragraph 13.

24 14. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 14.

26 15. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 15.

28 16. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 16.

2 17. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 17.

4 18. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 18.

6 19. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 19.

8 20. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 20.

10 21. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 21.

12 22. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 22.

14 23. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 23.

16 24. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 24.

18 25. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 25.

20 26. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 26.

22 27. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 27.

24 28. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 28.

26 29. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 29.

28 30. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 30.

2 31. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 31.

4 32. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 32.

6 33. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 33.

8 34. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 34.

10 35. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 35.

12 36. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 36.

14 37. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 37.

16 38. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 38.

18 39. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 39.

20 40. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 40.

22 41. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 41.

24 42. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 42.

26 43. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 43.

28 44. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 44.

2 45. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 45.

4 46. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 46.

6 47. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 47.

8 48. On information and belief, Defendant admits CTG filed for bankruptcy in late 2016.
9 Defendant lacks sufficient knowledge or information to form a belief as to the truth of the remaining
10 allegations contained in Paragraph 48.

11 49. Paragraph 49 makes no allegations so no response is required.

12 50. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 50.

14 51. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 51.

16 52. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 52.

18 53. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 53.

20 54. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 54.

22 55. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 55.

24 56. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 56.

26 57. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 57.

28 58. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 58.

2 59. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 59.

4 60. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 60.

6 61. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 61.

8 62. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 62.

10 63. No allegations are made in Paragraph 63; it requires no response.

11 64. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
12 allegations contained in Paragraph 64.

13 65. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
14 allegations contained in Paragraph 65.

15 66. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
16 allegations contained in Paragraph 66.

17 67. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
18 allegations contained in Paragraph 67.

19 68. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
20 allegations contained in Paragraph 68.

21 69. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
22 allegations contained in Paragraph 69.

23 70. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
24 allegations contained in Paragraph 70.

25 71. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
26 allegations contained in Paragraph 71.

27 72. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 72.

73. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 73.

74. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 74.

75. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 75.

76. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 76.

77. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 77.

78. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 78.

79. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 79.

80. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 80.

81. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 81.

82. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 82.

83. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 83.

84. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 84.

85. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 85.

86. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 86.

1 87. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
2 allegations contained in Paragraph 87.

3 88. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
4 allegations contained in paragraph 88.

5 89. No allegations are made in Paragraph 89; it requires no response.

6 90. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 90.

8 91. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 91.

10 92. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 92.

12 93. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 93.

14 94. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 94.

16 95. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 95.

18 96. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 96.

20 97. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 97.

22 98. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 98.

24 99. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 99.

26 100. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 100.

28 101. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 101.

2 102. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 102.

4 103. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 103.

6 104. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 104.

8 105. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 105.

10 106. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 106.

12 107. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 107.

14 108. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 108.

16 109. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 109.

18 110. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 110.

20 111. No allegations are made in Paragraph 111; it requires no response.

21 112. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
22 allegations contained in Paragraph 112.

23 113. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
24 allegations contained in Paragraph 113.

25 114. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
26 allegations contained in Paragraph 114.

27 115. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 115.

1 116. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
2 allegations contained in Paragraph 116.

3 117. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
4 allegations contained in Paragraph 117.

5 118. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
6 allegations contained in Paragraph 118.

7 119. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
8 allegations contained in Paragraph 119.

9 120. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
10 allegations contained in Paragraph 120.

11 121. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
12 allegations contained in Paragraph 121.

13 122. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
14 allegations contained in Paragraph 122.

15 123. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
16 allegations contained in Paragraph 123.

17 124. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
18 allegations contained in Paragraph 124.

19 125. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
20 allegations contained in Paragraph 125.

21 126. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
22 allegations contained in Paragraph 126.

23 127. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
24 allegations contained in Paragraph 127.

25 128. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
26 allegations contained in Paragraph 128.

27 129. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 129.

1 130. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
2 allegations contained in Paragraph 130.

3 131. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
4 allegations contained in Paragraph 131.

5 132. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
6 allegations contained in Paragraph 132.

7 133. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
8 allegations contained in Paragraph 133.

9 134. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
10 allegations contained in Paragraph 134.

11 135. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
12 allegations contained in Paragraph 135.

13 136. No allegations are made in Paragraph 136; it requires no response.

14 137. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 137.

16 138. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 138.

18 139. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 139.

20 140. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 140.

22 141. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 141.

24 142. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 142.

26 143. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 143.

28 144. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 144.

2 145. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 145.

4 146. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 146.

6 147. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 147.

8 148. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 148.

10 149. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 149.

12 150. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 150.

14 151. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 151.

16 152. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 152.

18 153. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 153.

20 154. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 154.

22 155. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 155.

24 156. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 156.

26 157. No allegations are made in Paragraph 157; it requires no response.

27 158. No allegations are made in Paragraph 158; it requires no response.

28 159. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 159.

2 160. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 160.

4 161. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 161.

6 162. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 162.

8 163. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 163.

10 164. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 164.

12 165. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 165.

14 166. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 166.

16 167. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 167.

18 168. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 168.

20 169. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 169.

22 170. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 170.

24 171. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 171.

26 172. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 172.

28 173. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 173.

2 174. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 174.

4 175. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 175.

6 176. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 176.

8 177. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 177.

10 178. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 178.

12 179. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 179.

14 180. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 180.

16 181. Paragraph 181 contains no allegations and requires no response.

17 182. Paragraph 182 contains no allegations and requires no response.

18 183. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 183.

20 184. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 184.

22 185. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 185.

24 186. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 186.

26 187. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 187.

28 188. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 188.

2 189. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 189.

4 190. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 190.

6 191. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 191.

8 192. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 192.

10 193. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 193.

12 194. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 194.

14 195. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 195.

16 196. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 196.

18 197. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 197.

20 198. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 198.

22 199. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 199.

24 200. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 200.

26 201. Paragraph 201 makes no allegations so no response is required.

27 202. Paragraph 202 makes no allegations so no response is required.

28 203. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 203.

2 204. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 204.

4 205. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 205.

6 206. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 206.

8 207. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 207.

10 208. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 208.

12 209. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 209.

14 210. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 210.

16 211. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 211.

18 212. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 212.

20 213. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 213.

22 214. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 214.

24 215. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 215.

26 216. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 216.

28 217. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 217.

2 218. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 218.

4 219. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 219.

6 220. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 220.

8 221. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 221.

10 222. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 222.

12 223. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 223.

14 224. Paragraph 224 requires no response because it contains no allegations.

15 225. Paragraph 225 requires no response because it contains no allegations.

16 226. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 226.

18 227. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 227.

20 228. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 228.

22 229. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 229.

24 230. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 230.

26 231. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
27 allegations contained in Paragraph 231.

28 232. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the

1 allegations contained in Paragraph 232.

2 233. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 233.

4 234. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 234.

6 235. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 235.

8 236. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 236.

10 237. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 237.

12 238. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 238.

14 239. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph 239.

16 240. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 240.

18 241. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 241.

20 242. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 242.

22 243. Paragraph 243 requires no response because it contains no allegations.

23 244. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
24 allegations contained in Paragraph 244.

25 245. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
26 allegations contained in Paragraph 245.

27 246. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 246.

1 247. Paragraph 247 requires no response because it contains no allegations.

2 248. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 248.

4 249. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 249.

6 250. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 250.

8 251. Paragraph 251 requires no response because it states no allegations.

9 252. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
10 allegations contained in Paragraph 252.

11 253. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
12 allegations contained in Paragraph 253.

13 254. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
14 allegations contained in Paragraph 254.

15 255. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
16 allegations contained in Paragraph 255.

17 256. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
18 allegations contained in Paragraph 256.

19 257. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
20 allegations contained in Paragraph 257.

21 258. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
22 allegations contained in Paragraph 258.

23 259. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
24 allegations contained in Paragraph 259.

25 260. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
26 allegations contained in Paragraph 260.

27 261. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 261.

1 262. Paragraph 262 requires no response because it makes no allegations.

2 263. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
3 allegations contained in Paragraph 263.

4 264. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
5 allegations contained in Paragraph 264

6 265. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
7 allegations contained in Paragraph 265.

8 266. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
9 allegations contained in Paragraph 266.

10 267. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
11 allegations contained in Paragraph 267.

12 268. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
13 allegations contained in Paragraph 268.

14 269. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
15 allegations contained in Paragraph

16 270. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
17 allegations contained in Paragraph 270.

18 271. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
19 allegations contained in Paragraph 271.

20 272. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
21 allegations contained in Paragraph 272.

22 273. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
23 allegations contained in Paragraph 273.

24 274. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
25 allegations contained in Paragraph 274.

26 275. Paragraph 275 makes no allegations so no response is required.

27 276. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 276.

- 1 277. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
2 allegations contained in Paragraph 277.
- 3 278. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
4 allegations contained in Paragraph 278.
- 5 279. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
6 allegations contained in Paragraph 279.
- 7 280. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
8 allegations contained in Paragraph 280.
- 9 281. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
10 allegations contained in Paragraph 281.
- 11 282. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
12 allegations contained in Paragraph 282.
- 13 283. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
14 allegations contained in Paragraph 283.
- 15 284. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
16 allegations contained in Paragraph 284.
- 17 285. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
18 allegations contained in Paragraph 285.
- 19 286. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
20 allegations contained in Paragraph 286.
- 21 287. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
22 allegations contained in Paragraph 287.
- 23 288. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
24 allegations contained in Paragraph 288.
- 25 289. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
26 allegations contained in Paragraph 289.
- 27 290. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the
28 allegations contained in Paragraph 290.

291. Defendant lacks sufficient knowledge or information to form a belief as to the truth of the allegations contained in Paragraph 291.

AFFIRMATIVE DEFENSES

Without in any way admitting any of the allegations of the Complaint, as separate and independent affirmative defenses, Defendant alleges as follows:

First Affirmative Defense

1. The Complaint and each alleged cause of action therein fails to state a claim against Defendant upon which relief can be granted.

Second Affirmative Defense

2. Each and all of the claims for relief alleged in the Complaint are barred by applicable statutes of limitation.

Third Affirmative Defense

3. Plaintiff is barred from the relief sought by the Complaint because of the doctrine of laches.

Fourth Affirmative Defense

4. Plaintiff is not entitled to any relief against Defendant because, through conduct of third parties, actions and inactions, Plaintiff has waived any and all rights to relief against Defendant and is thus barred from recovering anything from Defendant.

Fifth Affirmative Defense

5. Plaintiff is barred from recovering against Defendant on its Complaint, and each cause of action therein, because Defendant has performed and thereby been released and/or discharged from the claims asserted by Plaintiff.

Sixth Affirmative Defense

6. Plaintiff is barred from the relief sought by the Complaint because of the doctrine of estoppel.

Seventh Affirmative Defense

7. Plaintiff is barred from the relief sought in its Complaint by the equitable doctrine of unclean hands.

Eighth Affirmative Defense

8. Plaintiff is barred from the relief sought because it lacks standing.

Ninth Affirmative Defense

9. Defendant received the money both in good faith and for a reasonably equivalent value.

Tenth Affirmative Defense

10. Plaintiff is seeking to recover more than entitled to recover in this case, and any award would unjustly enrich the Plaintiff.

Eleventh Affirmative Defense

11. Plaintiff is barred from the relief sought because it received an indirect benefit from the transfers.

Twelfth Affirmative Defense

12. Plaintiff is barred from the relief sought by the equitable doctrine of waiver.

Thirteenth Affirmative Defense

13. Plaintiff is barred from the relief sought because it received an indirect benefit from the transfers.

Fourteenth Affirmative Defense

14. Plaintiff is barred from the relief sought because payments cannot be recovered through avoidance powers when they were payments made on an executory contract that the Debtor later assumed and assigned it received an indirect benefit from the transfers.

Fifteenth Affirmative Defense

[Reservation of Rights]

15. The pleadings do not describe the claims asserted against Defendant with sufficient particularity to enable it to determine all defenses it has or may have in response to the Complaint. Defendant, therefore, reserves the right to assert any and all additional affirmative defenses which may be pertinent to the Complaint once the precise nature of the Claims is ascertained through discovery.

WHEREFORE, Defendant prays as follows:

1. That Plaintiff take nothing by its Complaint;
2. That Plaintiff's Complaint be dismissed;
3. For costs of suit herein; and
4. For such other and further relief as the Court may deem just and proper.

DATED: August 6, 2019

SKLAR KIRSH, LLP

By:



Ian S. Landsberg
William H. Dance
Attorneys for Defendant Grant Thornton, LLP

PROOF OF SERVICE

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 1880 Century Park East, Suite 300, Los Angeles, California 90067.

A true and correct copy of the foregoing document described as “**DEFENDANT GRANT THORNTON LLP’S ANSWER TO SECOND AMENDED COMPLAINT**” will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

I. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (“NEF”)
(Pursuant to controlling General Order(s) and Local Bankruptcy Rule(s) (“LBR”), the foregoing document will be served by the court via NEF and hyperlink to the document. On **August 6, 2019**, checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email address(es) indicated below:

☒ Service information continued on attached page

II. SERVED BY U.S. MAIL OR OVERNIGHT MAIL (indicate method for each person or entity served): On **August 6, 2019**, I served the following person(s) and/or entity(ies) at the last known address(es) in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States Mail, first class, postage prepaid, and/or with an overnight mail service addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

III. SERVED BY PERSONAL DELIVERY, FACSIMILE TRANSMISSION OR EMAIL
(indicate method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on **August 6, 2019**, I served the following person(s) and/or entity(ies) by personal delivery, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on the judge will be completed no later than 24 hours after the document is filed.

United States Bankruptcy Court
Central District of California
255 E. Temple Street, Suite 1634 / Courtroom 1639
Los Angeles, CA 90012
Honorable Deborah J. Saltzman

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

8/6/2019
Date

Sarah Blasco
Type Name

/s/ Sarah Blasco
Signature

SERVICE LIST

Served By The Court Via Notice Of Electronic Filing ("NEF")

- **Keith Patrick Banner** kbanner@greenbergglusker.com, sharper@greenbergglusker.com; calendar@greenbergglusker.com
- **Peter J Benvenutti** pbenvenutti@kellerbenvenutti.com, pjbenven74@yahoo.com
- **Jonathan Boustani** jboustani@btlaw.com
- **Cheryl S Chang** Chang@Blankrome.com, Hno@BlankRome.com
- **Brian L Davidoff** bdavidoff@greenbergglusker.com, calendar@greenbergglusker.com; jking@greenbergglusker.com
- **Edward J Dennis** eburch@lynnllp.com
- **Tobias S Keller** tkeller@kellerbenvenutti.com
- **Ian Landsberg** ilandsberg@sklarkirsh.com, liskaist@sklarkirsh.com; yalarcon@sklarkirsh.com; ilandsberg@ecf.inforuptcy.com
- **Andrew B Levin** alevin@wcghlaw.com, Meir@virtualparalegalservices.com; pj@wcghlaw.com; jmartinez@wcghlaw.com
- **Christian A Orozco** corozco@lynnllp.com, thooker@lynnllp.com; ejohnson@lynnllp.com
- **Christopher O Rivas** crivas@reedsmith.com, chris-rivas-8658@ecf.pacerpro.com
- **Howard Steinberg** steinbergh@gtlaw.com, pearsallt@gtlaw.com; laik@gtlaw.com
- **David A Taylor** david@taylorstrategic.com
- **United States Trustee (ND)** ustregion16.nd.ecf@usdoj.gov

Served Via U.S. Mail:

United States Trustee
915 Wilshire Blvd, Suite 1850
Los Angeles, CA 90017

Corporate Recovery Associates, LLC, *Liquidating Trustee*
3830 Valley Centre Drive
Suite 705-152
San Diego, CA 92130

Andrew B Levin
Winthrop Couchot Golubow Hollander, LLP
1301 Dove Street, Suite 500
Newport Beach, CA 92660
Attorney for Corporate Recovery Associates, LLC, *Liquidating Trustee*

Christian A Orozco
Lynn Pinker Cox & Hurst LLP
2100 Ross Ave Ste. 2700
Dallas, TX 75201
Attorney for Corporate Recovery Associates, LLC, *Liquidating Trustee*

Cheryl S Chang
Blank Rome LLP
2029 Century Park East, Sixth Floor
Los Angeles, CA 90067
Attorney for Defendant Gladstone Investment Corporation